

Richard L. Schwartz (NY Bar No. 1821081)*
OFFICE OF THE ATTORNEY GENERAL
STATE OF NEW YORK
120 Broadway, 26th Floor
New York, New York 10271
Telephone: 212-416-8282 (Richard L. Schwartz)
Facsimile: 212-416-6015
Email: Richard.Schwartz@ag.ny.gov

Counsel for Plaintiff State of New York

**Automatic Pro Hac Vice Admission
Pursuant to Pretrial Order No. 1,
Dated July 3, 2007 (Waiving Civil L.R. 11-3)*

**[Additional moving parties and counsel
listed on signature pages]**

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

IN RE: TFT-LCD (FLAT PANEL)
ANTITRUST LITIGATION

This Document Relates to
Case Nos. 3:07-MD-1827 and 3:11-CV-711

STATE OF NEW YORK
by and through ERIC T. SCHNEIDERMAN,
Attorney General

Plaintiff,

v.

AU OPTRONICS CORPORATION, et al.,

Defendants.

MASTER FILE NO. 07-md-1827-SI
MDL File No. 1827

CASE NO. 3:11-CV-711-SI

**STIPULATION AND [PROPOSED]
ORDER MODIFYING PRETRIAL
SCHEDULE**

Judge Susan Y. Illston

1 Plaintiff State of New York and Defendants party to the above-captioned action
 2 (collectively, "Parties") hereby stipulate as follows:

3 **STIPULATION**

4 WHEREAS the Parties have conferred regarding the schedule set in the Court's Order
 5 re: Pretrial and Trial Schedule (Dkt. 2165) and modified by stipulation on June 2, 2011 (Dkt.
 6 3110) (the "July 12 Stipulation");

7 WHEREAS the Parties agree to the extension of dates set in the Pretrial and Trial
 8 Schedule in order to allow sufficient time for discovery and related work;

9 NOW, THEREFORE, the Parties, through their undersigned respective counsel,
 10 stipulate and agree as follows:

11 That the pretrial dates set forth in the Pretrial and Trial Schedule, as modified by the
 12 July 12 Stipulation, are hereby amended solely as to *State of New York v. AU Optronics*
 13 *Corporation, et al.*, Case No. 11-cv-0711;

14 That *State of New York v. AU Optronics Corporation, et al.*, Case No. 11-cv-0711,
 15 shall be considered as filed after December 1, 2010 solely for the purposes of the Pretrial and
 16 Trial Schedule, as modified by the July 12 Stipulation, and for no other purpose;

17 That the Parties shall meet and confer no later than December 31, 2011 to agree on a
 18 modified pretrial schedule;

19 That service of opening expert reports in *State of New York v. AU Optronics*
 20 *Corporation, et al.*, Case No. 11-cv-0711, will in no event be required earlier than four months
 21 after entry of the modified pretrial schedule; and

1 That service of opposition expert reports in *State of New York v. AU Optronics*
2 *Corporation, et al.*, Case No. 11-cv-0711, will in no event be required earlier than three months
3 after service of opening expert reports.
4

5
6 Dated: October 24, 2011

Respectfully submitted,

7 ERIC T. SCHNEIDERMAN
8 Attorney General of the State of New York

9 BY: _____/s/
10 Richard L. Schwartz
11 Acting Bureau Chief, Antitrust Bureau
12 120 Broadway, 26th Floor
13 New York, New York 10271
(212) 416-8282 (voice)
(212) 416-6195 (fax)
Richard.Schwartz@ag.ny.gov

14 *Counsel for Plaintiff State of New York*

15 *Automatic Pro Hac Vice Admission Pursuant to Pretrial
16 Order No. 1, Dated July 3, 2007 (Waiving Civil L.R. 11-3)

17
18 Dated: October 24, 2011

BY: _____/s/
19 Michael R. Lazerwitz (PRO HAC VICE)
20 Jeremy J. Calsyn (State Bar No. 205062)
21 Lee F. Berger (State Bar No. 222756)
22 CLEARY GOTTlieb STEEN & HAMILTON LLP
23 One Liberty Plaza
New York, NY 10006
(212) 225-2000 (Phone)
(212) 225-3999 (Facsimile)
mlazerwitz@cgsh.com

24 *Attorneys for Defendants LG Display Co., Ltd. and LG*
25 *Display America, Inc.*
26
27
28

1 Dated: October 24, 2011

BY: _____/s/
Christopher A. Nedeau
Carl L. Blumenstein
Allison Dibley
NOSSAMAN LLP
50 California Street, 34th Floor
San Francisco, CA 94111
(415) 438-7274 (telephone)

2
3
4
5
6
7 *Attorneys for Defendants AU Optronics Corporation and*
8 *AU Optronics Corporation America, Inc.*

9 Dated: October 24, 2011

BY: _____/s/
Sandra West (SBN 250389)
Christopher B. Hockett (SBN 121539)
Neal A. Potischman (SBN 254862)
DAVIS POLK & WARDWELL LLP
1600 El Camino Real
Menlo Park, CA 94025
(650) 752-2000 / (650) 752-2111
chris.hockett@davispolk.com
neal.potischman@davispolk.com
sandra.west@davispolk.com

10
11
12
13
14
15
16
17 *Attorneys for Defendants Chimei Innolux Corporation*
18 *(f/k/a/ Chi Mei Optoelectronics Corp.), Chi Mei*
Optoelectronics USA, Inc., and CMO Japan Co., Ltd.

19 Dated: October 24, 2011

BY: _____/s/
Kent M. Roger (SBN 95987)
MORGAN LEWIS & BOCKIUS LLP
One Market, Spear Street Tower
San Francisco, CA 94105
Telephone: (415) 442-1001
Facsimile: (415) 442-1001

20
21
22
23
24 *Attorney for Defendants Hitachi Ltd., Hitachi Displays*
25 *Ltd., and Hitachi Electronic Devices (USA), Inc.*
26
27
28

1 Dated: October 24, 2011

BY: _____/s/_____

2 Robert D. Wick (*pro hac vice*)
3 Derek Ludwin (*pro hac vice*)
4 Neil K. Roman (*pro hac vice*)
5 COVINGTON & BURLING LLP
6 1201 Pennsylvania Avenue, N.W.
7 Washington, D.C. 20004
8 (202) 662-6000 (telephone)
9 (202) 662-6291 (facsimile)
10 *rwick@cov.com*
11 *dludwin@cov.com*
12 *nroman@cov.com*

13 *Attorneys for Defendants Samsung Electronics Co., Ltd.,*
14 *Samsung Electronics America, Inc., and Samsung*
15 *Semiconductor, Inc.*

16 Dated: October 24, 2011

BY: _____/s/_____

17 John M. Grenfell
18 Jacob R. Sorensen
19 Fusae Nara
20 Andrew D. Lanphere
21 PILLSBURY WINTHROP SHAW PITTMAN LLP
22 50 Fremont Street
23 San Francisco, CA 94105

24 *Attorneys for Defendants Sharp Corporation and Sharp*
25 *Electronics Corp.*


BY: /s/
John H. Chung (*pro hac vice*)
WHITE & CASE LLP
1155 Avenue of the Americas
New York, NY 10036-2787
(212) 819-8200 (Phone)
(212) 354-8113 (Facsimile)
jchung@whitecase.com

Christopher M. Curran (*pro hac vice*)
 Kristen J. McAhren (*pro hac vice*)
 WHITE & CASE LLP
 701 Thirteenth Street, NW
 Washington, DC 20005-3807
 (202) 626-3600 (Phone)
 (202) 639-9355 (Facsimile)
 ccurran@whitecase.com
 kmcahren@whitecase.com

Attorneys for Defendants Toshiba Corporation, Toshiba Mobile Display Co., Ltd., Toshiba America Electronic Components, Inc., and Toshiba America Information Systems, Inc.

Attestation: The filer of this document attests that the concurrence of the other signatories thereto has been obtained.

SO ORDERED


Honorable Susan J. Illston

10/25/11
Date Entered